

## Amanda Taylor

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**From:** Herrick, Jordan <jherrick@baileywyant.com>  
**Sent:** Tuesday, October 15, 2024 10:13 AM  
**To:** Amanda Taylor; Shuman, David  
**Cc:** steve@newlawoffice.com; Emilee Wooldridge; Erin Lewis; Timothy P. Lupardus; Zachary Kyle Whitten  
**Subject:** RE: Fleenor v. PrimeCare, et al. - Wexford Depositions

Mandy:

That all is accurate. I have already confirmed Kennadi Smith is available on the proposed date/time. I will let you know as I hear from others.

Thanks,



[Jordan K. Herrick, Esquire](#)

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**From:** Amanda Taylor <amanda@thtwv.com>  
**Sent:** Tuesday, October 15, 2024 10:12 AM  
**To:** Herrick, Jordan <jherrick@baileywyant.com>; Shuman, David <dshuman@baileywyant.com>  
**Cc:** steve@newlawoffice.com; Emilee Wooldridge <emilee@newLawoffice.com>; Erin Lewis <erin@newLawoffice.com>; Timothy P. Lupardus <office@luparduslaw.com>; Zachary Kyle Whitten <zwhittenlaw@gmail.com>  
**Subject:** Fleenor v. PrimeCare, et al. - Wexford Depositions

## EXTERNAL EMAIL

Jordan:

In follow up to our phone call, I believe that we reached the following consensus:

1. You or Dave can make yourselves available on the proposed dates, and will make effort to secure Defendants' attendance as proposed
2. Smith, Marshall, Stroup, Brooks, and Miller will be produced without objection
3. Perkins, Jeffery, and Rashid (subject to medical clearance following surgery) will be produced with the tentative agreement that we will inquire about: (1) current Plaintiffs and (2) records we received from Wexford following their earlier depositions. You will need to confirm the latter portion of the agreement.
4. You will not produce Conn, Gedman, or Froelich without a Court order – we will file cross motions, and I believe we have conferred to the extent required

If any of that is not consistent with your understanding, please advise at your earliest convenience.

Thank you,  
Mandy

Amanda Taylor  
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